



**Commonwealth Edison**  
LaSalle County Nuclear Station  
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Telephone 815/357-6761

June 17, 1982

James G. Keppler  
Regional Administrator  
Directorate of Regulatory Operations, Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Sir:

This Special Report is being submitted to your office to notify you of the actions LaSalle County Station is taking concerning the Licensee Event Reports classified as personnel errors since the receipt of the Unit 1 Operating License.

On May 24, 1982, an On-Site Review was conducted by the Station Superintendent with the Assistant Superintendent of Operations, the Assistant Superintendent of Administrative and Support Services, the Senior Operating Engineer and the Technical Staff Supervisor as participants. The subject of the review was the number of Licensee Event Reports that occurred in the time period of April 17 through May 24, and more specifically the percentage of LER's that appeared to be personnel or procedural errors.

The findings of the review were:

1. Approximately 30% of all Deviation Reports were personnel errors.
2. Personnel were not always conducting surveillances properly.
3. Personnel were having difficulty interpreting the surveillance requirements and action statements of the Technical Specifications.
4. Surveillances were not always being reviewed thoroughly.
5. Communications between departments need improvement.

The Review Group recommended the following actions:

1. Continue the corrective actions indicated in the LER's.
2. Have all LER's distributed to the three Assistant Superintendents for their review and departmental training where appropriate.
3. Increase Operating Engineer and Technical Staff Supervisor feedback to shift personnel on surveillance errors.

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4. Obtain the assistance of the On-Site Nuclear Safety Group in analyzing LER's for trends or fundamental problems.

The recommendations of the On-Site Review were initiated shortly after the completion of the On-Site Review.

As of June 10, 1982, the percentage of personnel error LER's has not improved significantly. The same On-Site Review Group has determined that the following areas require more concentrated management review and action:

1. Technical Specification Surveillances and implementation of action statements.
2. Plant Status.

The following management programs are being implemented at LaSalle to analyze and/or correct problems in the above two areas.

1. Each Assistant Superintendent will have reviewed this subject matter with the appropriate management personnel by June 27. The general areas being reviewed are:
  - a. Technical Specification adherence to action statements and thorough review of the Technical Specifications to ensure all actions are accomplished.
  - b. Communications between all Departments and the Operating Department to ensure that all items are properly reviewed and prompt corrective action is taken.
  - c. Whenever degradation of equipment covered by the Technical Specifications requires entry into an Action Statement, the action requirements will be reviewed and agreed upon by two Senior Reactor Operators. If there is any doubt, an Operating Engineer and/or Operations Duty Supervisor will be contacted for clarification and direction. This program will be continued until On-Site Review concludes it is no longer required.
  - d. Priority of work assignment should include review of plant safety and plant reliability concerns.
2. A review of surveillance activities in the following Departments is being conducted on a sample basis to determine if surveillances are scheduled and current.
  - a. Instrument Maintenance.
  - b. Radiation/Chemistry.
  - c. Technical Staff.

The sample size is approximately 10% of those assigned to the respective departments. The results of the review will be reviewed by June 25 and if the results are not satisfactory an On-Site Review will be conducted to determine further actions.

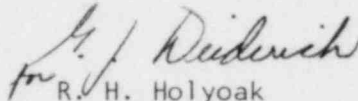
3. A complete review of the Station Matrix which assigns surveillances to the responsible Departments will be completed by June 25.
4. On a long term basis the feasibility of developing a Matrix to aid the Operator in determining which Equipment applies to what Technical Specification is being evaluated.
5. A review of all LER's is being conducted by a former LaSalle Shift Foreman who was a Licensed Senior Reactor Operator on Dresden Unit 2. The review is being conducted to determine if specific individuals, Shift Crews, or Departments are having fundamental problems. The results of this review will be documented in a LaSalle On-Site Review Report.
6. On a short term basis two additional personnel who previously held Reactor Operator Licenses on Commonwealth Edison's BWR's are being placed on shifts that have highest levels of activity so that the Shift Engineer and Station Control Room Engineer can increase their level of attention to plant status and Technical Specifications.
7. On a short term basis a Senior Reactor Operator has been assigned to ensure appropriate LER's are reviewed with the appropriate departments.
8. Increased management attention will be placed on Control Room indication problems. A status list of outstanding work requests related to bogus annunciator and position indication problems in the Control Room will be maintained and reviewed with the Senior Resident Inspector by the Operating Engineer. This program will be maintained until such time as the Resident Inspector agrees that it is no longer required.
9. Modifications to plant design are being considered to correct recurring equipment problems and operating problems. Examples of such modifications that are in progress are:
  - a. Stack Monitor Flow transmitter.
  - b. Control Room ventilation tornado damper trip signals.
  - c. ECCS keep filled alarm reset span.

A list of modifications is available on-site for the Senior Resident Inspector's review.

10. A review of valve and electrical lineup status is being conducted on a sample basis to verify that there is not a problem in maintaining proper plant status. The sample will include approximately 50% of instrument root and rack valves in the Reactor Building. The sample will also include approximately 20% of safety related valve and electrical lineups. Furthermore in accordance with the stations normal procedures complete valve and electrical lineups on certain systems are being reverified as correct prior to Startup.
11. The amount of work assigned to crafts in safety related areas will be reviewed to determine if more of such work can be assigned to station personnel. On a short term basis a special construction management team has been established to coordinate Unit 1 work assigned to construction crafts.

12. An Engineering review is being conducted to determine if the one drawing error on instrument piping has a larger impact than reported in the previous LER. This review should be completed by July 15, 1982.
13. Unit two preoperational tests where appropriate will be changed to include functional test and/or physical walkdown of the installation of certain safety related instruments to verify proper design and construction.

The above discussion is submitted for your information. If there are any questions please contact Mr. J. C. Renwick at extension 243 at LaSalle County Station.

  
for R. H. Holyoak

Superintendent  
LaSalle County Station

RHH/JCR/msj

cc: Director Nuclear Licensing

RDB

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